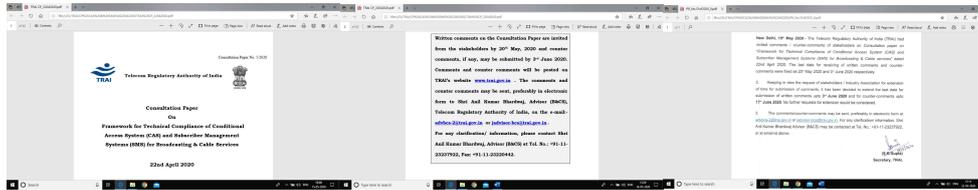


Comments on CP CAS-CMS 220420



QUESTIONS

Q1. List all the important features of CAS & SMS to adequately cover all the requirements for Digital Addressable Systems with a focus on the content protection and the factual reporting of subscriptions. Please provide exhaustive list, including the features specified in Schedule III of Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017?

Q2. As per audit procedure (in compliance with Schedule III), a certificate from CAS / SMS vendor suffices to confirm the compliance. Do you think that all the CAS & SMS comply with the requisite features as enumerated in question 1 above? If not, what additional checks or compliance measures are required to improve the compliance of CAS/SMS?

Q3. Do you consider that there is a need to define a framework for CAS/ SMS systems to benchmark the minimum requirements of the system before these can be deployed by any DPO in India?

Q4. What safeguards are necessary so that consumers as well as other stakeholders do not suffer for want of regular upgrade/ configuration by CAS/ SMS vendors?

Q5. a) Who should be entrusted with the task of defining the framework for CAS & SMS in India? Justify your choice with reasons thereof. Describe the structure and functioning procedure of such entrusted entity.

(b) What should be the mechanism/ structure, so as to ensure that stakeholders engage actively in the decision-making process for making test specifications / procedures? Support your response with any existing model adapted in India or globally.

Q6. Once the technical framework for CAS & SMS is developed, please suggest a suitable model for compliance mechanism.

a) Should there be a designated agency to carry out the testing and certification to ensure compliance to such framework? Or alternatively should the work of testing and certification be entrusted with accredited testing labs empanelled by the standards making agency/ government? Please provide detailed suggestion including the benefits and limitations (if any) of the suggested model.

(b) What precaution should be taken at the planning stage for smooth implementation of standardization and certification of CAS and SMS in Indian market? Do you foresee any challenges in implementation?

(c) What should be the oversight mechanism to ensure continued compliance? Please provide your comments with reasoning sharing the national/ international best practices.

Q7. Once a new framework is established, what should be the mechanism to ensure that all CAS/ SMS comply with the specifications? Should existing and deployed CAS/ SMS systems be mandated to conform to the framework? If yes please suggest the timelines. If no, how will the level playing field and assurance of common minimum framework be achieved?

Q8. Do you think standardization and certification of CAS and SMS will bring economic efficiency, improve quality of service and improve end- consumer experience? Kindly provide detailed comments.

Q9. Any other issue relevant to the present consultation

ANSWERS

Ans.1 Please refer to Ans.9
Ans.2 Please refer to Ans.9
Ans.3 Please refer to Ans.9
Ans.4 Please refer to Ans.9
Ans.5 Please refer to Ans.9
Ans.6 Please refer to Ans.9
Ans.7 Please refer to Ans.9
Ans.8 Please refer to Ans.9

Ans.9

- I) CAS, CMS, STB need to be compatible. STB needs to be interoperable. Kindly refer to Recommendations dated 10042020 on Interoperability of Set Top Box.
- II) In para 2.6.3 of CP a comparison is briefly discussed between a carded CAS and cardless CAS. A carded CAS is more suitable for an Interoperable STB.
- III) In para 2.4 of CP there is a mention of Interconnections Regulation, 2017. This Regulation has undergone two amendments as of date. These amendments need to be kept in view while considering the current CP.
- IV) In para 12 of the Explanatory Memorandum of Second Amendment of Interconnection Regulation, 2017 there is a mention of footprints of satellite vis-à-vis target area. Accordingly HITS and DTH operators can declare whole of INDIA as their target area. In reality foot prints go beyond National Boundaries. This could be a reason for alleged smuggling of STBs' to other countries. In the present exercise, may be, finding a solution to this problem may also be addressed.
- V) The retrofitting of existing STBs' may only be attempted if it makes STB interoperable as envisaged in relevant regulations already in place and referred to in I) above.
- VI) The provision of interoperable STB may be delinked from service provider and customer should have the freedom of choice of interoperable STB at his end like purchase of a mobile phone of his/her choice.

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